

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
<http://www.epa.gov/region08>

September 13, 2004

Ref: 8EPR-SR

St. John's Lutheran Church Board of Directors
1017 Montana Avenue
Libby, MT 59923

Dear Board of Directors:

In August 2003, United States Environmental Protection Agency (EPA) performed an emergency removal action at the former St. John's Lutheran Day Care facility, located at 1024 Montana Avenue. The removal action was in response to the finding of visible vermiculite and asbestos in the playground area. While preliminary data from other soil samples taken at the property also indicated the presence of asbestos contamination (i.e., lined flowerbed at the front of the property), EPA was not able to address these areas at the time due to the limited timeframe for cleanup (start of school) and the more urgent need to remove the higher risk exposures in the playground area. (Attached is a letter to Pastor Christiansen dated August 26, 2003, summarizing the events leading up to the playground removal activities.)

In an effort to address the remaining asbestos contamination at the property not removed during the playground cleanup, EPA contractors performed additional sampling in May 2004. Results of this sampling revealed the presence of amphibole asbestos contamination in 1) the Parking Area and 2) the Flowerbed, adjacent to the east side of the building. Subsequently, these areas of property were added to EPA's Summer 2004 list for sites to be cleaned-up.

Recently, Dave Spielman, a subcontractor to EPA, spoke with Dave Schmidt, a representative of St. John's Lutheran Church Board of Directors, about the cleanup process. During these discussions Mr. Schmidt expressed concerns about the need for a cleanup. Mr. Schmidt stated that the St. John's Lutheran Church Board Members had discussed this issue and felt that that low levels of asbestos contamination in the parking area were not of concern because the parking area was newly installed (a few years ago) and that asbestos in the flowerbeds did not pose a significant health risk because students and children did not routinely play in this area.

At this time, we are asking to reconsider your position in this matter. The asbestos contamination present in the driveway and flowerbeds presents an ongoing hazard for the release of asbestos fibers into the air with any disturbance (e.g., movement of motor vehicles, bicycles, kids playing and running, gardening, etc.). While these particular asbestos exposures may be relatively small and limited in duration, they add to the cumulative exposures that occur from many sources still present throughout the Libby community. It is these cumulative exposures that occur in association with a variety of activities and situations that increase each individual's risk for disease. This is especially important for children, who retain the asbestos fibers in their lungs for a much longer time-frame. Furthermore, asbestos contaminated soils in high usage areas such as driveways and gardens, can lead to increased asbestos contamination of nearby



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homes, businesses, and cars, resulting in persistent and increased risks in these environments as well.

As you know, EPA is making every effort to reduce the asbestos contamination in the Libby community to help reduce and protect individuals from asbestos disease. We understand that disruption of school programs and ongoing activities can be challenging; however we are willing to work closely with your organization in planning the most accommodating approaches and scheduling possible.

If you have any questions, please contact the EPA Information Center in Libby at 293-6194.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Christiansen", is written over a horizontal line.

Jim Christiansen
Remedial Project Manager

Attachments (1)



US Department of Transportation
Volpe National Transportation Systems Center
EPA Information Center • 501 Mineral Avenue • Libby, MT 59923
Phone: 406-293-6194 Fax: 406-293-5668

August 26, 2003

St. John Lutheran Church
1017 Montana
Libby, MT 59923

Dear Pastor Christiansen:

As you requested, I am writing to summarize the events leading up to the removal of contaminated soil from the St. John Lutheran Day Care property at 1024 Montana.

On April 18, 2001, eighteen (18) surface and subsurface soil samples were collected from the property. On June 21, 2001, Duc Nguyen, On-Scene Coordinator for the EPA, met with Helen Bledsoe and Ron Harris of the St. John Lutheran Church Board to discuss the results. Eleven (11) of the eighteen samples had <1% Libby Amphibole asbestos detected; four of which were collected from the surface soils. Duc and the board members discussed the analytical results and the associated risk, and the EPA was asked to take no further action at the property.

A Comprehensive Screening Study (CSS) investigation was completed on October 15, 2002. The purpose of the CSS investigation was to collect information in order to fully characterize the interior and exterior condition of the property. At that time, no visible vermiculite was present in the interior, the yards, flowerbeds, or playground. Soil samples were collected but have not yet been analyzed.

During the week of August 18, 2003, Myresa Boulware from Kootenai Valley Christian School contacted the EPA Information Center. Ms. Boulware notified us that she was leasing the property from St. John Lutheran Church and requested a copy of the CSS



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investigation form. Someone had informed Ms. Boulware that visible vermiculite was present on the playground and she was concerned about her students playing in that area. An inspection team visited the property on August 20 - 21, 2003 and found evidence of visible vermiculite and asbestos on the surface of the playground. Because of the presence of visible asbestos on the surface, an immediate clean up of the playground was required.

If you have any questions about the sampling that occurred or the clean up that is currently taking place, please feel free to contact me at the EPA Information Center, 406-293-6194.

Sincerely,

Original Signed

Courtney Zamora
Site Manager
USDOT - Volpe Center